

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	INDICTMENT	CR 12-185 ADM/FLN
)		
Plaintiff,)	(18 U.S.C. § 922(g)(1))	
)	(18 U.S.C. § 924(c)(1)(A))	
v.)	(18 U.S.C. § 924(a)(2))	
)	(18 U.S.C. § 924(d)(1))	
1. RIKKI LEE GILOW,)	(21 U.S.C. § 841(a)(1))	
)	(21 U.S.C. § 841(b)(1)(B))	
2. JERRY ANTHONY HARVEY, and)	(21 U.S.C. § 841(b)(1)(C))	
)	(21 U.S.C. § 846)	
3. ERIC MICHELLE HUNTER,)	(21 U.S.C. § 853)	
)	(28 U.S.C. § 2461(c))	
Defendants.)		

THE UNITED STATES GRAND JURY CHARGES THAT:

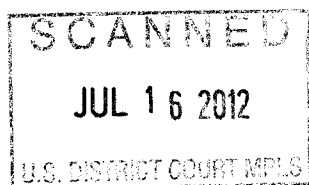
COUNT 1

(Conspiracy to Distribute Controlled Substances)

Beginning in or about September 14, 2011, and continuing through on or about July 16, 2012, in the State and District of Minnesota and elsewhere, the defendants,

RIKKI LEE GILOW,
JERRY ANTHONY HARVEY, and
ERIC MICHELLE HUNTER,

did unlawfully, knowingly and intentionally conspire with each other and with others, known and unknown to the grand jury, to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, a mixture and substance containing a detectable amount of cocaine, a mixture and substance containing a detectable amount of methamphetamine, a mixture and substance containing a detectable amount of 5-methoxy-N,N-diisopropyltryptamine ("5-MeO-DIPT"), also



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RICHARD D. SLETTEN
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known as "Foxy," a mixture and substance containing a detectable amount of 3,4-Methylenedioxypyrovalerone ("MDPV"), also known as "Ivory Wave," and a mixture and substance containing a detectable amount of benzylpiperazine ("BZP"), all controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 846.

COUNT 2

(Distribution of 5-MeO-DIPT)

On or about September 14, 2011, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 52 tablets of a mixture and substance containing a detectable amount of 5-methoxy-N,N-diisopropyltryptamine ("5-MeO-DIPT"), also known as "Foxy," a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 3

(Distribution of MDPV and 5-MeO-DIPT)

On or about November 15, 2011, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

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each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 33 tablets of a mixture and substance containing a detectable amount of 5-methoxy-N,N-diisopropyltryptamine ("5-MeO-DIPT"), also known as and "Foxy," and approximately 66 tablets of a mixture and substance containing a detectable amount of 3,4-Methylenedioxypyrovalerone ("MDPV"), also known as "Ivory Wave," both controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 4

(Distribution of Heroin)

On or about January 18, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 7.57 grams of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

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COUNT 5

(Distribution of Heroin)

On or about January 19, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 9.33 grams of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 6

(Distribution of Cocaine Base)

On or about January 24, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 2.40 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

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COUNT 7

(Distribution of BZP)

On or about February 9, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 50 tablets of a mixture and substance containing a detectable amount of benzylpiperazine ("BZP"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 8

(Distribution of BZP)

On or about February 14, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 50 tablets of a mixture and substance containing a detectable amount of benzylpiperazine ("BZP"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

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COUNT 9

(Distribution of BZP)

On or about March 15, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 50 tablets of a mixture and substance containing a detectable amount of benzylpiperazine ("BZP"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 10

(Distribution of Cocaine)

On or about March 20, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 46.11 grams of a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

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COUNT 11

(Distribution of Cocaine)

On or about March 23, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 215.31 grams of a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 12

(Distribution of Heroin)

On or about April 17, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 25.08 grams of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

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COUNT 13

(Distribution of Heroin)

On or about April 20, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW,
JERRY ANTHONY HARVEY, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the others, did unlawfully, knowingly and intentionally distribute approximately 74.65 grams of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 14

(Distribution of Heroin)

On or about May 2, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 73.81 grams of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

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COUNT 15

(Using and Carrying a Firearm During and in
Relation to a Drug Trafficking Crime)

On or about May 2, 2012, in the State and District of
Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, during and in relation to a
drug trafficking crime for which they may be prosecuted in a court
of the United States, that is, the crime set forth in Count 14 of
this indictment, which is hereby realleged and incorporated herein
by reference, did knowingly and unlawfully use and carry a firearm,
that is, a Smith & Wesson, Model 686-1, .357 caliber revolver,
serial number AUY3382, in violation of Title 18, United States
Code, Sections 2 and 924(c)(1)(A).

COUNT 16

(Felon in Possession of a Firearm)

On or about May 2, 2012, in the State and District of
Minnesota, the defendant,

ERIC MICHELLE HUNTER,

having previously been convicted of crimes punishable by
imprisonment for a term exceeding one year, in the places and on or
about the dates indicated, that is,

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Crime	Place of Conviction	Date Committed	Date Sentenced
Grand Larceny	Circuit Court of Adams County, Mississippi	01/10/1990	02/11/1991
Possession of Cocaine	Circuit Court of Adams County, Mississippi	02/02/1994	09/30/1994
Felon in Possession of a Deadly Weapon	Circuit Court of Adams County, Mississippi	03/13/1994	09/30/1994
Intimidation and Assault on a Law Enforcement Officer	Circuit Court of Adams County, Mississippi	02/13/1995	01/26/1996
Possession With Intent to Distribute Cocaine Base	United States District Court, Minnesota	12/18/1998	07/21/1999

did knowingly and unlawfully possess, in and affecting interstate commerce, a firearm, that is, a Smith & Wesson, Model 686-1, .357 caliber revolver, serial number AUY3382, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 17

(Distribution of Methamphetamine and BZP)

On or about May 16, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 50 tablets, 31 tablets of

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which contained approximately 9.61 grams of a mixture and substance containing a detectable amount of methamphetamine, and 19 tablets of which contained a mixture and substance containing a detectable amount of benzylpiperazine ("BZP"), both controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 18

(Distribution of Heroin)

On or about May 22, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute approximately 25.24 grams of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 19

(Using and Carrying a Firearm During and in
Relation to a Drug Trafficking Crime)

On or about May 22, 2012, in the State and District of Minnesota, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

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each aiding and abetting the other, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, the crime set forth in Count 18 of this indictment, which is hereby realleged and incorporated herein by reference, did knowingly and unlawfully use and carry a firearm, that is, an AA Arms, Model AP9, 9 millimeter semi-automatic pistol, serial number 046847, in violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A).

COUNT 20

(Felon in Possession of a Firearm)

On or about May 22, 2012, in the State and District of Minnesota, the defendant,

ERIC MICHELLE HUNTER,

having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, in the places and on or about the dates indicated, that is,

Crime	Place of Conviction	Date Committed	Date Sentenced
Grand Larceny	Circuit Court of Adams County, Mississippi	01/10/1990	02/11/1991
Possession of Cocaine	Circuit Court of Adams County, Mississippi	02/02/1994	09/30/1994
Felon in Possession of a Deadly Weapon	Circuit Court of Adams County, Mississippi	03/13/1994	09/30/1994

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Intimidation and Assault on a Law Enforcement Officer	Circuit Court of Adams County, Mississippi	02/13/1995	01/26/1996
Possession With Intent to Distribute Cocaine Base	United States District Court, Minnesota	12/18/1998	07/21/1999

did knowingly and unlawfully possess, in and affecting interstate commerce, a firearm, that is, an AA Arms, Model AP9, 9 millimeter semi-automatic pistol, serial number 046847, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION AS TO DRUG COUNTS

If convicted of any of Counts 1 through 14 or Counts 17 and 18 of this indictment, the defendants,

**RIKKI LEE GILOW,
JERRY ANTHONY HARVEY, and
ERIC MICHELLE HUNTER,**

shall forfeit to the United States any property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of each such violation; any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of each such violation; and any substitute for such property under Title 21, United States Code, Section 853(p); all pursuant to Title 21, United States Code, Section 853.

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FORFEITURE ALLEGATION AS TO GUN COUNTS

If convicted of any of Counts 15, 16, 19 or 20 of this indictment, the defendants,

**RIKKI LEE GILOW, and
ERIC MICHELLE HUNTER,**

shall forfeit to the United States any firearms, accessories and ammunition involved in or used in connection with such violations including, but not limited to, a Smith & Wesson, Model 686-1, .357 caliber revolver, serial number AUY3382, and an AA Arms, Model AP9, 9 millimeter semi-automatic pistol, serial number 046847, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON